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BY HAND

**MEMO ENDORSED**

November 11, 2009

Honorable Denise L. Cote  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, N.Y. 10013

Re: Travel Request, Thomas T. Prousalis  
03-cr.1509

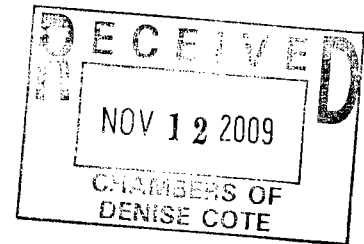
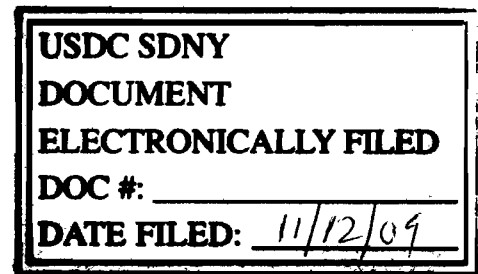
Dear Judge Cote:

As this Court is aware, I was recently appointed by the Court, pursuant to the Criminal Justice Act, to represent Mr. Thomas T. Prousalis, in connection with Supervised Release issues, pending before the Court. Prior thereto, Mr. Prousalis had been representing himself in a *Pro Se* capacity.

At the request of and on behalf of my client, I am writing to seek permission from the Court to allow him to travel for business purposes during the period of November 12, 2009 through December 7, 2009 to Tirana, Albania. I have enclosed a copy the Travel Request Form and proposed itiniary, previously submitted to the U.S. Probation Office, Eastern District of Virginia.

I understand that via e-mail communication of November 6, 2009, to Mr. Prousalis, the Probation Department, by Ms. Elissa F. Martins, has denied said request. (Enclosed is a copy of the November 6, 2009 e-mail, as well as follow-up e-mails of November 8 and 9, 2009 between the parties.)

I am enclosing the November 11, 2009 letter from Mr. Prousalis to Ms. Martins, which recounts in detail, his travel plans and business needs. In addition, Mr. Prousalis addresses troubling issues, regarding the bases of Ms. Martins denial of



Mr. Prousalis' travel requests.

It seems apparent to counsel that if Mr. Prousalis is to achieve a future financial position to satisfy his substantial restitution obligations, he must be able to pursue business opportunities, of which this business trip is but one example.

Moreover, it appears that Mr. Prousalis' basic right to work and seek to earn a decent living is being substantially impeded by the restrictions imposed thereupon by the Probation Department.

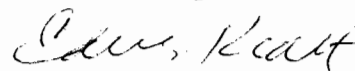
Hence, I respectfully request that this Court approve Mr. Prousalis' travel plans, thereby allowing him to pursue his enumerated business activities.

It should be noted that prior applications for overseas travel have heretofore been approved by the Probation Department.

Please notify me of the Court's decision so that Mr. Prousalis' business, travel and lodging plans can be confirmed in advance of those dates, should permission be granted.

Thank you for your understanding and consideration in this matter.

Sincerely,



Edward M. Kratt

encl.

cc: AUSA Seetha Ramachandran, Via Facsimile, w/o encl.  
U.S. Probation Officer Elissa F. Martins, Via Facsimile, w/o Encl.

*The application is denied. Should the defendant wish to advance the Dec. 10 conference so that outstanding issues of compliance can be addressed, he should consult with Mr. Rojas and the Government to arrange a prompt court appearance.*  
*James Cole*  
*Nov. 12, 2009*

COPIES SENT TO

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U.S. Probation Department  
Attn: Margaret A. Carroll